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11 *Attorneys for Defendant/Counterclaimant*
12 *Ivan Tapia and Defendants Angela Cruikshank,
Jeff Cruikshank, and Justin Owens*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
16 a New York corporation dba IM MASTERY
ACADEMY,

17 Plaintiff,

18 | V

19 DAVID IMONITIE an individual; SPELA
20 SLUGA, an individual; DEVON ROESER,
21 an individual; IVAN TAPIA, an individual;
22 NVISIONU, INC., a Delaware corporation;
23 ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
24 IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
25 CAVALLERI, an individual; JOSE
MIGUEL CONTREAS, an individual; BASS
26 GRANT, an individual; ANGELA
CRUIKSHANK, an individual; JEFF
27 CRUIKSHANK, an individual; VINCE
MURPHY, an individual; GARY
28 MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME FOR
FILING OF REPLY TO RESPONSE TO
DEFENDANTS' JOINT MOTION FOR
PROTECTIVE ORDER (ECF NO. 233)
(SECOND REQUEST)**

1 WORGESS, an individual; LUIS
2 RONALDO HARNANDEZ ARRIAGA, an
3 individual; STEPHANIA AYO, an
4 individual; SILVIA AYO, an individual;
5 CATALINA VASQUEZ, an individual;
6 MATHIAS VASQUEZ, an individual;
7 DOES 1 through 10, inclusive; and ROE
8 CORPORATIONS I through X, inclusive,

9
10 Defendants.

11 AND ALL RELATED MATTERS

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**STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING
OF REPLY TO RESPONSE TO DEFENDANTS' JOINT MOTION FOR PROTECTIVE
ORDER (ECF NO. 233)
(SECOND REQUEST)**

Defendant/Counterclaimant Ivan Tapia (“Tapia”), along with Defendant/Counterclaimant David Imonitie and Defendants Spela Sluga, Devon Roeser and NVisionU, Inc. (collectively, the “Joint Defendants”), and Plaintiff/Counterdefendant International Markets Live Inc. (“IML”), (collectively, the “Parties”), by and through their respective undersigned counsel of record, the law firms of Slighting Law, James Dodge Russell & Stephens PC, Wellman & Warren LLP, Kerr Simpson Attorneys at Law, and Holland & Hart LLP, hereby stipulate and agree to: 1) extend the deadline for Joint Defendants to file their Reply to IML’s Response to Defendants’ Joint Motion for Protective Order (ECF No. 233) from August 4, 2023 to August 11, 2023. This is the second stipulation to extend the Reply deadline. The Parties hereby specifically agree and stipulate as follows:

WHEREAS, on July 7, 2023, Joint Defendants filed their Motion for Protective Order (ECF No. 222).

1 WHEREAS, on July 20, 2023, IML filed its Response to Defendants' Joint Motion for
2 Protective Order (ECF No. 233), thereby making Joint Defendants' Reply to IML's Response
3 currently due July 27, 2023.

4 WHEREAS, on July 26, 2023, counsel for the Parties met and conferred via text message
5 and agreed to allow Joint Defendants an additional eight (8) days to file their Reply to IML's
6 Response, thereby extending the deadline for their Reply from July 27, 2023 to August 4, 2023.

7 WHEREAS, on July 28, 2023, based upon the July 26, 2023 stipulation of the Parties, the
8 Court entered its Order extending the deadline for the Joint Defendants to file their Reply from July
9 27, 2023 to August 4, 2023 (ECF No. 239).

10 WHEREAS, on August 3, 2023, counsel for the Parties met and conferred via text message
11 and agreed to allow Joint Defendants an additional seven (7) days to file their Reply to IML's
12 Response, thereby extending the deadline for the Joint Defendants to file their Reply from August
13 4, 2023 to August 11, 2023.

14 WHEREAS, no parties oppose the extension of time for the filing of Joint Defendants'
15 Reply to IML's Response as set forth herein.

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1 THEREFORE, the Parties stipulate and agree to extend the deadline for Joint Defendants to
2 file their Reply to IML's Response to Defendants' Joint Motion for Protective Order from August,
3 4, 2023 to August 11, 2023 and respectfully request that the Court approve and order the same.

4 IT IS SO STIPULATED this 3rd day of August 2023.

5 SLIGHTING LAW

6 /s/ Bradley S. Slighting

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ROESER; NVISIONU, INC., Bass Grant,
Lucas Longmire, Vince Murphy*

26 IT IS SO ORDERED:



27
28 UNITED STATES MAGISTRATE JUDGE

DATED: August 4, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of August, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF REPLY TO RESPONSE TO DEFENDANTS' JOINT MOTION FOR PROTECTIVE ORDER (ECF NO. 233) (SECOND REQUEST)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

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